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6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 2:23-CR-214-WBS

11 Plaintiff,

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

12 v.

13 JIOVANNI ELEAZAR PACO,

DATE: February 24, 2025

14 Defendant.

TIME: 9:00 a.m.

COURT: Hon. William B. Shubb

16 STIPULATION

17 1. This matter was set for status conference before the Honorable William B. Shubb on
18 November 4, 2024. Time has been excluded through and including February 24, 2025.

19 2. By this stipulation, the parties request to continue the status conference to May 27, 2025,
20 at 10:00 a.m., and to exclude time between February 24, 2025, and May 27, 2025, under Local Code T4.

21 3. The parties agree and stipulate, and request that the Court find the following:

22 a) The government has represented that the discovery associated with this case
23 includes investigative reports and related documents in electronic form including over 4,698
24 pages of documents, numerous photographs, lab reports, criminal history reports, multiple video
25 and audio recordings, and other material. All of this discovery has been either produced directly
26 to counsel and/or made available for inspection.

1 b) Counsel for defendant desires additional time to consult with his client, review the
2 charges, conduct investigation and research related to the charges, review the discovery, discuss
3 potential resolutions with his client, prepare pretrial motions, and otherwise prepare for trial.

4 c) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny him the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of February 24, 2025 to May 27,
13 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
14 T4] because it results from a continuance granted by the Court at defendant's request on the basis
15 of the Court's finding that the ends of justice served by taking such action outweigh the best
16 interest of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20 IT IS SO STIPULATED.

21 Respectfully Submitted,

22 Dated: February 18, 2025

23 MICHELE BECKWITH
Acting United States Attorney

24 By: /s/ DAVID W. SPENCER
25 DAVID W. SPENCER
26 Assistant United States Attorney

27 Dated: February 18, 2025

28 /s/ MICHAEL E. HANSEN
MICHAEL E. HANSEN
Counsel for Defendant
Jiovanni Eleazar Paco

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2 **ORDER**
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5 IT IS SO FOUND AND ORDERED.
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8 Dated: February 18, 2025
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11 WILLIAM B. SHUBB
12 UNITED STATES DISTRICT JUDGE
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